

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOVAN VAVIC,

Defendant.

CRIMINAL NO.: 19-CR-10081-IT-MPK

MOTION FOR LEAVE TO TRAVEL OUTSIDE THE UNITED STATES

Defendant Jovan Vavic, by and through undersigned counsel, hereby moves this Court for an order modifying his conditions of pretrial release to permit him to travel out of country from July 23, 2025 through October 10, 2025. As grounds for this motion, Mr. Vavic states as follows.

1. Mr. Vavic was arraigned in the above-captioned case on September 15, 2020, and was released by this Court on pretrial conditions, including restrictions on his travel outside of the United States. (Doc. 107). He has been in full compliance with all conditions of his pretrial release since that date and has always appeared in court when required to do so.

2. A jury returned guilty verdicts against Mr. Vavic on April 8, 2022 (Doc. 1235), but this Court granted Mr. Vavic a new trial on September 15, 2022 (Doc. 1405). The government has taken an appeal of the Court's new trial order (Doc. 1422), which matter has been completed.

3. On several previous occasions, this Court has granted Mr. Vavic's requests for leave to travel internationally, including on June 21, 2021 (Doc. 716), August 23, 2021 (Doc. 771), September 19, 2022 (Doc. 1408), July 19, 2023 (Doc. 1496) and May 14, 2024 (Doc. 1510). In each instance, Mr. Vavic has fully complied with the Court's and U.S. Probation's directives

concerning his travel, including promptly returning his passport to Probation after each trip.

3. This Court rejected Mr. Vavic's request for return of his passport generally on April 27, 2023, noting that Mr. Vavic had not demonstrated a compelling need to be free from the requirement that he request advance permission for travel outside of the United States. (Doc. 1478). In that same Order, however, this Court noted that it "anticipates that future detailed motions are likely to be permitted, including for travel to conduct seasonal water polo training camps abroad or to tend to Defendant's parents' health in Montenegro." *Id.* Mr. Vavic was subsequently granted leave to travel to Montenegro (to visit his elderly parents), Croatia (to coach water polo camps) and Italy (to visit his son). (Doc. 1496).

4. Mr. Vavic now seeks leave to travel to Montenegro from July 23, 2025, to October 10, 2025, to visit with and care for his parents, who live in Igalo, Montenegro, and is further requesting leave to travel over the border to Bosnia Herzegovina and Serbia, as necessary, for purposes of assisting his parents with potential medical issues that may arise due to their advancing age that may require more advanced medical care than is available in Montenegro.

5. In connection with his travel, Mr. Vavic will check in with Probation within 48 hours of his departure from and return to the United States. He also will abide by all of the remaining conditions of his pretrial release and will return his passport to Probation upon his return from his international travel.

7. Counsel for Mr. Vavic has conferred with the government, by and through Assistant U.S. Attorney Ian Stearns and can report that the government takes no position regarding the request for travel.

Dated: July 11, 2025

Respectfully submitted,

/s/ Stephen G. Larson

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Attorneys for Defendant JOVAN VAVIC

LOCAL RULE 7.1 CERTIFICATION.

Undersigned counsel certifies that counsel for Mr. Vavic has conferred with counsel for the government,

/s/ Stephen G. Larson
Stephen G. Larson

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on July 11, 2025.

/s/ Stephen G. Larson
Stephen G. Larson